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August 18, 1998

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AUG 18 1998

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Magalie Roman Salas  
Secretary  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, DC 20554

Re: MM Docket No. 98-93

Dear Ms. Salas:

We are submitting herewith on behalf of Northwestern College, licensee of Class C FM broadcast stations, the original and six copies of its Comments in response to the Commission's Notice of Proposed Rule Making and Order in MM Docket No. 98-93 (FCC 98-117), released June 15, 1998.

Should there be any questions concerning these Comments, please communicate with the undersigned.

Very truly yours,

*John R. Wilner*

John R. Wilner  
Counsel for Northwestern College

JRW/vih

Enclosures

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## Northwestern College Radio

*Radio Group • SkyLight Satellite Network • Northwestern Productions*

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Magalie Roman Salas  
Secretary  
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1919 M Street N.W.  
Washington, DC 20554

RE: MM Docket No. 98-93 (New Class CO)

Northwestern College, licensee of Stations KFNW FM, Fargo, North Dakota, KTIS FM, Minneapolis, Minnesota, and KNWS FM, Waterloo, Iowa, submits these Comments in response to the Commission's proposal in its Notice of Proposed Rule Making and Order in MM Docket No. 98-93 whereby numerous existing Class C FM stations, including the three stations licensed to Northwestern College, would be downgraded to the new Class CO for stations with a maximum antenna height of 450 meters.

### KFNW FM

In 1983 the Commission enacted a policy whereby existing Class C stations were required to meet minimum facility height requirements within a three-year time frame or be reclassified to a new station class. We did not have the financial base at the time to increase the tower height of KFNW FM and more importantly, if we'd had the money, the station didn't have a place to go. There was no tower space available for KFNW FM to go on an existing tower or real estate for us to construct our own tower. So, after the three-year period, KFNW FM was reclassified to C1 status.

Several years later, land became available for a new FM tower. In 1993 we applied for a construction permit to construct a 1,050 foot tower for KFNW FM that would make it eligible for reclassification to full Class C status. The total cost of the project was over one million dollars. We made this move to have the greatest potential outreach possible.

Now comes the Commission's proposal to require Class C stations to operate with minimum height requirement of at least 451 meters and another three-year period in which to come up to that standard or be reclassified to Class CO.

The ultimate effect on Northwestern College is in the long term. New Class C frequencies will encroach upon and/or damage KFNW FM's outreach. This will be especially true in distant communities that receive stations on closely-adjacent frequencies. For example: southeast of Fargo the communities of Wahpeton, North Dakota, and Breckenridge, Rothsay, Barnesville, Lake Park and Hawley, all in Minnesota, at the present time generate contribution revenue totaling \$18,257 yearly. We could easily

Magalie Roman Salas  
Secretary, FCC  
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lose revenue in these important areas. If this holds true with the other areas we serve, we could potentially lose over \$70,000 per year.

Additionally there are the costs involved. As already indicated, the cost to us in making the move to increase our tower height to the minimum set in 1983 was substantial. Further it is not possible to add on to KFNW FM's existing tower, so even if we could afford the capital expenditure, we are back at square one. Moreover, we cannot tear down the existing tower in order to erect another tower that would be at least 451 meters in height.

KTIS FM/KNWS FM

Up to this point I've only spoken about one of our stations. Northwestern College owns two other Class C stations that would be affected by the proposed downgrade to CO status. They are:

KTIS FM, Minneapolis/ Saint Paul


This station shares antenna space with seven other metropolitan stations at 1,050'. In 1990 we spent close to \$1 million dollars to be a part of the community group. The situation here is the same as KFNW FM, Fargo. Increasing the tower height is not possible.

KNWS FM, Waterloo, Iowa

This station reaches into rural areas similar to KFNW FM. New Class C frequencies will encroach upon and/or damage KNWS FM's outreach.

We respectfully request that this proposed rule making not be acted upon.

Sincerely,

  
Harv Hendrickson  
Vice President for Broadcast Support

HH/jg